

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

UNITED STATES OF AMERICA

v.

Criminal Action No.: 2:18-00152

MENIS E. KETCHUM, II,

Defendant.

MOTION TO MODIFY CONDITIONS OF RELEASE

The appearance bond conditions imposed upon Menis E. Ketchum, II provide:

3. The Defendant's travel is restricted to the Southern District of West Virginia.

Defendant, by counsel, moves to modify this condition of release to allow Defendant to travel, periodically to his daughter's home located at 6778 Keansburg Road, Gibsonville, North Carolina 27249 after notifying his supervising probation officer, Steven M. Phillips. The daughter's farm is located near Greensboro, North Carolina in the Middle District of North Carolina.

Rationale for the above Motion to Modify

The Defendants daughter, Kelli Ketchum Morgan, is married to James H. Morgan, a general surgeon. They moved recently, in late September, 2018, from their small farm in Barboursville, West Virginia to Gibsonville, North Carolina. They purchased a small farm in Gibsonville where they have horses, chickens, and other animals.

Kelli Ketchum Morgan is a housewife who maintains the farm and is working to put her new home, farm buildings and farm grounds into a proper condition. James H. Morgan practices general surgery in hospitals in the Greensboro area.

The Defendant's daughter needs assistance in getting the farm, buildings, and home into a proper condition. Defendant and his wife previously provided this help at their daughter's farm located in Merritts Creek in Cabell County. They regularly worked on the upkeep and remodeling her old farm house and buildings, mucked the horse stalls, fed the chickens, helped take care of the other farm animals. More importantly, they regularly worked on the upkeep of the farm grounds and buildings.

Defendant would like to travel periodically with his wife to Gibsonville to visit and help his daughter prior to his sentencing which is now scheduled for January 30, 2019 which could include times during the upcoming holidays. The dates of departure and return would vary. Defendant will notify his supervising probation officer prior to traveling to or from his daughter's home. The Defendant will travel directly to Gibsonville and return directly to Huntington, West Virginia. Defendant will keep his probation officer Steven Phillips fully informed of any travel to and from his daughter's farm.

Respectfully Submitted:

/s/ James M. Cagle

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CERTIFICATE OF SERVICE

The undersigned, Counsel for the Defendant Menis E. Ketchum II, does hereby certify that a true and correct copy of the ***Motion to Modify Conditions of Release*** served via electronic filing and service has been made on opposing counsel, Philip H. Wright, AUSA on this the 9th day of November, 2018.

/s/ James M. Cagle

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